

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

12-11-07
04:59 PM

Application of Pacific Gas and Electric
Company To Revise Its Electric Marginal
Costs, Revenue Allocation, And Rate
Design.

Application No. 06-03-005

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE
DYNAMIC PRICING WORKSHOPS HELD ON NOVEMBER 5-6, 2007**

Pursuant to the schedule established in the August 22, 2007 Supplemental Scoping Memo and Assigned Commissioner's Ruling (ACR), as modified by the November 16, 2007 Administrative Law Judge's ruling extending the filing date, Pacific Gas and Electric Company (PG&E) hereby submits its comments on the Dynamic Pricing workshops convened by the Energy Division on November 5-6, 2007. PG&E commends the Energy Division staff and the Assigned Commissioner's Adviser for their preparation of a comprehensive agenda and discussion materials, which included a well-balanced summary of nearly all of the views expressed and positions taken in the various parties' opening and reply comments in this investigation.

PG&E's workshop comments are brief, reflecting our judgment that the published workshop agenda and prepared discussion materials have adequately captured positions expressed in our previous comments. PG&E's comments are presented in the order in which these subjects were discussed at the workshops.

Discussion at the workshops largely confirmed positions taken by PG&E in its opening and reply comments on the issues presented in the ACR. PG&E expects to offer critical peak pricing and time-of-use (TOU) rates to growing numbers of customers from

all customer classes as AMI meters are deployed across the service area, and PG&E is also proposing to offer a new Peak Time Rebate (PTR) program for residential customers as the new meters are installed. However, development of prospective real-time pricing tariffs must be deferred until after the California Independent System Operator (CAISO) Market Redesign and Technology Upgrade (MRTU) is fully implemented.

1. Rate Design Objectives

PG&E supports the statement of “preliminary conclusions” for rate design objectives, as presented in the Commission staff “PG&E Dynamic Pricing Workshop A.06-03-005 California Public Utilities Commission November 5 and 6, 2007” workshop materials (slide 7). In particular, PG&E agrees with the conclusion that long-run marginal costs should be emphasized and concurs with the clear statement that stability, simplicity and preservation of customer choice are all important rate design objectives.

2. Data Sources for Marginal Costs

PG&E is generally supportive of all of the preliminary conclusions listed in the workshop agenda for generation energy and capacity marginal costs. However, PG&E cautions that specific work items involved in reviewing and applying new CAISO day-ahead market prices will have to wait until after MRTU is fully implemented and has been functioning for a period of at least 12 to 18 months. Thus, there will most likely not be the opportunity for further review of the new CAISO prices under the aegis of the current dynamic pricing investigation. PG&E also agrees with the clear statement that the focus of the current investigation should not expand beyond generation costs.

3. Time-Varying Cost Components

PG&E is supportive of the preliminary conclusions listed for this subject area, except that it does not believe that further examination of capacity cost allocations to

TOU periods will be necessary for the purposes of the current investigation. This is an example of an area where the Commission might best exercise caution, so as not to call for re-litigation of the same issues in multiple forums. PG&E believes there are adequate opportunities within the scope of each utility's regular General Rate Case (GRC) rate design proceedings for assessment of how capacity costs are best allocated to TOU periods based on the particular circumstances of each utility's customer base and system load shape characteristics.

4. Real Time Pricing (RTP)

PG&E concurs with the conclusion that it is premature to begin addressing most RTP rate design issues now, and that further action should be deferred until after the MRTU is fully implemented and adequate market information is available. This is discussed further under Section 11 of these comments.

5. Critical Peak Pricing (CPP)

PG&E concurs with the preliminary conclusions that CPP rates should be designed consistent with long-run marginal cost principles, and that CPP rate design issues should be considered further in this dynamic pricing investigation. Towards that end, PG&E encourages parties to review the record on voluntary CPP rates for large customers from A.05-01-016, including the all-party rate design settlement submitted on May 1, 2006. Although that settlement was not ultimately adopted by the Commission, PG&E believes the rate design principles embodied there which could be used as a solid starting point for an updated large customer CPP rate design to be adopted in this proceeding. In particular, the 2006 settlement rate design principles would afford a method for updating the original large customer CPP rate design (which was first established in the fall of 2002) to better reflect current large customer cost allocation and

rate design while also bringing design parameters for the large customer CPP program in closer accord with the CPP program for smaller customers. If the Commission concurs with this approach, PG&E would be prepared to develop updated sample rates based on the 2006 settlement rate design principles and make them available for discussion at the workshops to be held early next year.

6. Time of Use (TOU)

PG&E concurs with the preliminary conclusion that this investigation should focus on more dynamic pricing, and not on developing updated TOU rates. Further consideration of residential and agricultural TOU rate design policy can be conducted in General Rate Case proceedings.

7. Peak Time Rebates (PTR)

Concurrently with these workshop comments, PG&E is also filing a PTR rate proposal for residential customers, as part of its Smart Meter Upgrade (SMU) application. PG&E urges the adoption of its PTR proposal there, and believes that the new PTR program will advance the Commission's demand response goals and complement the existing portfolio of rate choices available to PG&E's residential customers.

8. Hedging Premiums and Cost of Service

PG&E notes that parties attending the workshop offered a variety of information and opinions concerning the theoretical basis for hedging premiums. Many parties appear to share PG&E's concern that this concept is not yet well defined for ratemaking purposes. Where hedging premiums have been developed in other jurisdictions, there are indications that their purpose may not always be one of simple economics or based on cost of service principles. For example, CLECA's consultant, Barbara Barkovich, shared her perspective that hedge premiums were implemented in New York state as a means of

incenting large customers to move from bundled service to direct access. On balance, PG&E does not believe that a sufficient foundation has been established for further consideration of hedging premiums in California.

9. What Rates for Which Customer Classes?

PG&E generally concurs with the preliminary conclusions stated in this section of the workshop agenda, which notes that future development of RTP rates would be undertaken first only for the very largest commercial and industrial customers. However, PG&E would observe that the Commission has already authorized voluntary CPP rates for PG&E's residential customers which will apply to all usage (not just "above Tier 2" usage), as indicated in Decision D.06-07-027.

10. Hedging Options for RTP and CPP Rates

Please refer to Section 8 of these comments for additional discussion of this subject. PG&E believes that further consideration of hedging options should be deferred pending future design and implementation of RTP tariffs.

11. When Should New Rates Be Introduced?

PG&E expects to offer CPP and TOU rates to growing numbers of customers from all customer classes as AMI meters are deployed across the service area, and PG&E is also proposing to offer a new PTR program for residential customers as the new meters are installed. If revised CPP rates for large customers can be agreed upon through a workshop process (as discussed in Section 5 of these comments), these changes could be implemented for the summer of 2009. PG&E proposes to implement the new PTR program for residential customers starting in the summer of 2010. However, further development of prospective real-time pricing tariffs for large customers must be deferred until after the CAISO MRTU is fully implemented and has been functioning for a period

of at least 12 to 18 months. Provided that the MRTU process moves forward as currently scheduled, this work could most likely be started in the rate design phase of PG&E's 2011 GRC.

12. Revenue Recovery

PG&E believes there was agreement at the workshop that revenue recovery issues will generally need to be addressed on a case-by-case basis as new rates and programs are developed. The circumstances of each new tariff or program can be very different (*e.g.*, providing for fixed numbers of operations versus programs called on an as-needed basis), so it is difficult to establish a single approach that would cover all future rate and program offerings.

13. Other Issues

Customer access to usage data is important. As AMI meters are deployed and the SmartMeter Upgrade goes into operation, customers will have the ability to view their usage practically in "real time" through Home Area Network (HAN) communications once they install a HAN compatible energy information display device. Prior to completion of the AMI deployment, customers with interval meters can view their usage information the following day.¹ These customers currently can get usage data in real time if they install additional technology to access meter pulse data.

The Automatic Data Exchange (ADE) required under PG&E's AMI decision, D.06-07-027, also will provide additional access to customer data for qualified third parties on the same timeframe and terms as the data is made available to PG&E internal departments. The ADE proposal will be filed no later than July 20, 2009 under D. 07-09-037.

¹ These customers are primarily large with demands of 200 kW or greater.

14. Conclusion

Dynamic rate design is part of a larger effort to make California's electric energy utilities and industries more economically efficient on the demand and supply side.

There are a number of proceedings addressing the inter-related issues, which was recognized in the November 5 and 6th workshop in this proceeding. PG&E reminds the Commission that it, the CAISO, the utilities, the customers and other stakeholders need a coherent, coordinated approach among Commission proceedings, and between the Commission and the CAISO. In this connection, PG&E respectfully requests that the Commission consider PG&E's comments when formulating dynamic pricing policy and deciding on the next steps to take in this proceeding.

Respectfully Submitted,

ANDREW L. NIVEN
SHIRLEY A. WOO

By: _____ /S/
SHIRLEY A. WOO

PACIFIC GAS AND ELECTRIC COMPANY
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-2248
Facsimile: (415) 973-5520
Internet: saw0@pge.com

Dated: December 11, 2007

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department, PO Box 7442, San Francisco, CA 94120.

On the 11th day of December, 2007, I served a true copy of:

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE DYNAMIC
PRICING WORKSHOPS HELD ON NOVEMBER 5-6, 2007**

By e-mail to all parties to A.06-03-005.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 11th day of December, 2007.

/S/

LINDA S. DANNEWITZ

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

EDITORIAL ASSISTANT
CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE
SAN FRANCISCO CA 94110
Email: cem@newsdata.com
Status: INFORMATION

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: Case.Admin@sce.com
Status: INFORMATION

Nilgun Atamturk
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5303
SAN FRANCISCO CA 94102-3214
Email: nil@cpuc.ca.gov
Status: STATE-SERVICE

R. THOMAS BEACH PRINCIPAL
CROSSBORDER ENERGY
2560 NINTH ST, STE 213A
BERKELEY CA 94710-2557
FOR: Crossborder Energy
Email: tomb@crossborderenergy.com
Status: PARTY

SCOTT BLAISING ATTORNEY
BRAUN & BLAISING, P.C.
915 L ST, STE 1420
SACRAMENTO CA 95814
Email: blaising@braunlegal.com
Status: INFORMATION

STEVEN BRAITHWAIT
CA ENERGY CONSULTING
4610 UNIVERSITY AVE. STE 700
MADISON WI 53705
Email: sdbraithwait@caenergy.com
Status: INFORMATION

THERESA BURKE REGULATORY ANALYST
SAN FRANCISCO PUC
1155 MARKET ST, 4TH FLR
SAN FRANCISCO CA 94103
Email: tburke@sfwater.org
Status: INFORMATION

MRW & ASSOCIATES, INC.
1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

Paul Angelopulo
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5031
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: pfa@cpuc.ca.gov
Status: PARTY

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
Email: brbarkovich@earthlink.net
Status: INFORMATION

Robert Benjamin
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: bkb@cpuc.ca.gov
Status: STATE-SERVICE

WILLIAM H. BOOTH ATTORNEY
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVE, 5TH FLR
WALNUT CREEK CA 94596
FOR: CA Large Energy Consumers Association
Email: wbooth@booth-law.com
Status: PARTY

MAURICE BRUBAKER
BRUBAKER & ASSOCIATES
PO BOX 412000
1215 FERN RIDGE PARKWAY, STE 208
ST. LOUIS MO 63141
Email: mbrubaker@consultbai.com
Status: INFORMATION

DAVID J. BYERS, ESQ. ATTORNEY
MCCRACKEN, BYERS & HAESLOOP, LLP
1920 LESLIE ST
SAN MATEO CA 94403
FOR: California City County Street Light Association (CAL-SLA)
Email: dbyers@landuselaw.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

Andrew Campbell
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5203
SAN FRANCISCO CA 94102-3214
Email: agc@cpuc.ca.gov
Status: STATE-SERVICE

STEPHEN L. CASNER
1454 REVELSTOKE WAY
SUNNYVALE CA 94087
Email: casner@packetdesign.com
Status: INFORMATION

KATHLEEN H. CORDOVA
SDG&E-SOCALGAS
8300 CENTURY PARK CT - CP31-E
SAN DIEGO CA 92123-1530
Email: KCordova@semprautilities.com
Status: INFORMATION

KAY DAVOODI ACQ-UTILITY RATES AND STUDIES
OFFICE
NAVAL FACILITIES ENGINEERING COMMAND HQ
1322 PATTERSON AVE., SE - BLDG 33
WASHINGTON NAVY YARD DC 20374-5018
Email: khojasteh.davoodi@navy.mil
Status: INFORMATION

RALPH E. DENNIS DIRECTOR, REGULATORY AFFAIRS
FELLON-MCCORD & ASSOCIATES
CONSTELLATION NEWENERGY-GAS DIVISION
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE KY 40223
Email: ralph.dennis@constellation.com
Status: INFORMATION

AHMAD FARUQUI
THE BRATTLE GROUP
353 SACRAMENTO ST, STE 1140
SAN FRANCISCO CA 94111
Email: ahmad.faruqui@brattle.com
Status: INFORMATION

MICHAEL P. FLORIO ATTORNEY
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVE, STE.350
SAN FRANCISCO CA 94102
FOR: TURN
Email: mflorio@turn.org
Status: PARTY

DAN L. CARROLL
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLR
SACRAMENTO CA 95814
Email: dcarroll@downeybrand.com
Status: INFORMATION

DANIEL COOLEY ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B30A
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: dfc2@pge.com
Status: PARTY

Christopher Danforth
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: ctd@cpuc.ca.gov
Status: STATE-SERVICE

MICHAEL B. DAY ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Solar Alliance
Email: mday@goodinmacbride.com
Status: PARTY

DANIEL W. DOUGLASS ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367-8102
FOR: Direct Access Customer Coalition/Western Power
Trading Forum
Email: douglass@energyattorney.com
Status: PARTY

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
101 ASH ST, CP31E
SAN DIEGO CA 92101
Email: CentralFiles@semprautilities.com
Status: INFORMATION

KELLY M. FOLEY ATTORNEY
SEMPRA ENERGY
101 ASH ST, HQ12
SAN DIEGO CA 92101-3017
FOR: San Diego Gas & Electric Company
Email: kfoley@sempra.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

BRUCE FOSTER VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVE, STE. 2040
SAN FRANCISCO CA 94102
Email: bruce.foster@sce.com
Status: INFORMATION

Jack Fulcher
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: jef@cpuc.ca.gov
Status: STATE-SERVICE

DAN GEIS
THE DOLPHIN GROUP
925 L ST, STE 800
SACRAMENTO CA 95814
Email: dgeis@dolphingroup.org
Status: INFORMATION

HAYLEY GOODSON ATTORNEY
THE UTILITY REFORM NETWORK
711 VAN NESS AVE, STE 350
SAN FRANCISCO CA 94102
FOR: The Utility Reform Network
Email: hayley@turn.org
Status: INFORMATION

LYNN HAUG
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95816
FOR: California Department of General Services/Energy
Policy Advisory Committee, East Bay Municipal Utili
Email: lmh@eslawfirm.com
Status: PARTY

Gregory Heiden
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5039
SAN FRANCISCO CA 94102-3214
Email: gxh@cpuc.ca.gov
Status: PARTY

ROSS C. HEMPHILL
FREEMAN SULLIVAN & CO.
101 MONTGOMERY ST., 15TH FLR
SAN FRANCISCO CA 94104
Email: rosshemphill@fscgroup.com
Status: INFORMATION

David K. Fukutome
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5042
SAN FRANCISCO CA 94102-3214
Email: dkf@cpuc.ca.gov
Status: STATE-SERVICE

NORMAN J. FURUTA ATTORNEY
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., STE 1744
SAN FRANCISCO CA 94103-1399
FOR: Federal Executive Agencies
Email: norman.furuta@navy.mil
Status: PARTY

STEPHEN GEORGE
FREEMAN SULLIVAN & CO.
101 MONTGOMERY ST., 15TH FLR
SAN FRANCISCO CA 94104
Email: stephengeorge@fscgroup.com
Status: INFORMATION

PETER HANSCHEN ATTORNEY
MORRISON & FOERSTER
101 YGNACIO VALLEY ROAD
WALNUT CREEK CA 94596
FOR: Agricultural Energy Consumers Association
Email: phansch@mofo.com
Status: PARTY

MARCEL HAWIGER ATTORNEY
THE UTILITY REFORM NETWORK
711 VAN NESS AVE, STE 350
SAN FRANCISCO CA 94102
FOR: The Utility Reform Network
Email: marcel@turn.org
Status: PARTY

RON HELGENS
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B10A
77 BEALE ST
SAN FRANCISCO CA 94105
Email: rrh3@pge.com
Status: INFORMATION

WENDY L. ILLINGWORTH
ECONOMIC INSIGHTS
320 FEATHER LANE
SANTA CRUZ CA 95060
Email: wendy@econinsights.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

EVELYN KAHL ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Energy Producers & Users Coalition
Email: ek@a-klaw.com
Status: PARTY

SUE KATELEY EXECUTIVE DIRECTOR
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN
PO BOX 782
RIO VISTA CA 94571
Email: info@calseia.org
Status: INFORMATION

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON CA 95620-4208
FOR: Energy Users Forum
Email: cmkehrein@ems-ca.com
Status: PARTY

Dexter E. Khoury
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: bsl@cpuc.ca.gov
Status: STATE-SERVICE

THOMAS S KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95352-4060
Email: tomk@mid.org
Status: INFORMATION

Donald J. Lafrenz
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: dlf@cpuc.ca.gov
Status: STATE-SERVICE

DONALD C. LIDDELL ATTORNEY
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
Email: liddell@energyattorney.com
Status: INFORMATION

Bruce Kaneshiro
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: bsk@cpuc.ca.gov
Status: STATE-SERVICE

RANDALL W. KEEN ATTORNEY
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD
LOS ANGELES CA 90064
FOR: Indicated Commercial Parties (ICP)
Email: rkeen@manatt.com
Status: PARTY

PAUL KERKORIAN
UTILITY COST MANAGEMENT, LLC
6475 N PALM AVE., STE. 105
FRESNO CA 93704
FOR: California Rice Millers, ADM Rice, Inc.
Email: pk@utilitycostmanagement.com
Status: PARTY

ANN H. KIM ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, MAIL CODE B30A
SAN FRANCISCO CA 94120-7442
FOR: Pacific Gas and Electric Company
Email: ahk4@pge.com
Status: PARTY

GREGORY KLATT ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, NO.1030
WOODLAND HILLS CA 91367
FOR: Wal-Mart/JC Penney/Alliance for Retail Energy
Markets and Direct Access Customer Coalition
Email: klatt@energyattorney.com
Status: PARTY

ROGER LEVY
LEVY AND ASSOCIATES
2805 HUNTINGTON ROAD
SACRAMENTO CA 95864
Email: rogerl47@aol.com
Status: INFORMATION

RONALD LIEBERT ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
FOR: California Farm Bureau Federation
Email: rliebert@cbbf.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE CA 95843
Email: karen@klindh.com
Status: INFORMATION

CAROL MANSON REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT CP32D
SAN DIEGO CA 92123
Email: cmanson@semprautilities.com
Status: INFORMATION

MARK S. MARTINEZ
SOUTHERN CALIFORNIA EDISON
6060J IRWINDALE AVE., STE J
IRWINDALE CA 91702
Email: mark.s.martinez@sce.com
Status: INFORMATION

KEITH R. MCCREA ATTORNEY
SUTHERLAND, ASBILL & BRENNAN, LLP
1275 PENNSYLVANIA AVE., NW
WASHINGTON DC 20004-2415
FOR: California Manufacturers & Technology Assn.
Email: keith.mccrea@sablaw.com
Status: PARTY

GAIL A. MCNULTY ASSOCIATE GOVERNMENTAL
PROGRAM ANALYST
NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, RM 364
SACRAMENTO CA 95814
FOR: Southern California Edison Company
Email: francis.mcnulty@sce.com
Status: PARTY

STEPHEN A.S. MORRISON ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM 234
SAN FRANCISCO CA 94102-4682
FOR: City and County of San Francisco
Email: stephen.morrison@sfgov.org
Status: PARTY

ROB NEENAN
CALIFORNIA LEAGUE OF FOOD PROCESSORS
1755 CREEKSIDE OAKS DRIVE, STE 250
SACRAMENTO CA 95833
FOR: California League of Food Processors
Email: rob@clfp.com
Status: PARTY

THOMAS J. MACBRIDE, JR. ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: The Building Owners and Managers Associations of
San Francisco and California
Email: tmacbride@goodinmacbride.com
Status: PARTY

BILL MARCUS
JBS ENERGY
311 D ST, STE. A
WEST SACRAMENTO CA 95605
Email: bill@jbsenergy.com
Status: INFORMATION

RICHARD MCCANN, PH.D
M. CUBED
2655 PORTAGE BAY ROAD, STE 3
DAVIS CA 95616
Email: rmccann@umich.edu
Status: INFORMATION

FRANCIS MCNULTY ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: francis.mcnulty@sce.com
Status: PARTY

SAMARA MINDEL REGULATORY AFFAIRS ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE KY 40223
Email: smindel@knowledgeinenergy.com
Status: INFORMATION

April Mulqueen
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: am4@cpuc.ca.gov
Status: STATE-SERVICE

LES NELSON
WESTERN RENEWABLES GROUP
30012 AVENTURA, STE A
RANCHO SANTA MARGARITA CA 92688
Email: lnelson@westernrenewables.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

LARRY NIXON
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: lmn3@pge.com
Status: INFORMATION

MARICRUZ PRADO ATTORNEY
SOUTHERN CALIFORNIA EDISON CO.
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
Email: maricruz.prado@sce.com
Status: PARTY

Felix Robles
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: fvr@cpuc.ca.gov
Status: STATE-SERVICE

Steve Roscow
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: scr@cpuc.ca.gov
Status: STATE-SERVICE

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, STE 320
CHESTERFIELD MO 63017
FOR: Cogeneration Association of California
Email: jimross@r-c-s-inc.com
Status: PARTY

STACIE SCHAFFER ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE, RM 390
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: stacie.schaffer@sce.com
Status: PARTY

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVE
BERKELEY CA 94703-2714
FOR: California City-County Street Light Association
Email: rschmidt@bartlewells.com
Status: PARTY

EDWARD G. POOLE ATTORNEY
ANDERSON & POOLE
601 CALIFORNIA ST, STE 1300
SAN FRANCISCO CA 94108-2818
FOR: Western Manufactured Housing Community Assoc.
Email: epoole@adplaw.com
Status: PARTY

BILL F. ROBERTS
ECONOMIC SCIENCES CORPORATION
1516 LEROY AVE
BERKELEY CA 94708
FOR: Building Owners and Managers Associations
Email: bill@econsci.com
Status: PARTY

LAURA ROOKE SR. PROJECT MANAGER
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST.,
PORTLAND OR 97204
Email: laura.rooke@pgn.com
Status: INFORMATION

J. P. ROSS VICE PRESIDENT STRATEGIC RELATIONS
SUNGEVITY
1625 SHATTUCK AVE., STE 21-
BERKELEY CA 94709
Email: jpross@sungevity.com
Status: PARTY

CHARMIN ROUNDTREE-BAAQEE
EAST BAY MUD
375 11TH ST
OAKLAND CA 94607
FOR: East Bay MUD
Email: cbaaqee@ebmud.com
Status: PARTY

GAYATRI M. SCHILBERG
JBS ENERGY, INC.
311 D ST, STE A
WEST SACRAMENTO CA 95605
FOR: The Utility Reform Network
Email: gayatri@jbsenergy.com
Status: PARTY

DEBORAH S. SHEFLER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO CA 94120
FOR: Pacific Gas and Electric Company
Email: DSS8@pge.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

NORA SHERIFF ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
Email: nes@a-klaw.com
Status: INFORMATION

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO CO 81301
Email: kjsimonsen@ems-ca.com
Status: INFORMATION

JAMES D. SQUERI ATTORNEY
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: California Retailers Association
Email: jsqueri@gmssr.com
Status: PARTY

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
Email: filings@a-klaw.com
Status: INFORMATION

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, STE 210
WALNUT CREEK CA 94597
Email: pthompson@summitblue.com
Status: INFORMATION

GREG TROPSA PRESIDENT
ICE ENERGY, INC.
9351 EASTMAN PARK DRIVE, UNIT B
WINDSOR CO 80550
FOR: Ice Energy, Inc.
Email: gtropsa@ice-energy.com
Status: PARTY

Rebecca Tsai-Wei Lee
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: wtr@cpuc.ca.gov
Status: STATE-SERVICE

JENNIFER SHIGEKAWA ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: Jennifer.Shigekawa@sce.com
Status: INFORMATION

JEANNE M. SOLE DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO CA 94102
Email: jeanne.sole@sfgov.org
Status: INFORMATION

SEEMA SRINIVASAN ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Cogeneration Association of California
Email: sls@a-klaw.com
Status: PARTY

RENE THOMAS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, BO10A
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: rat9@pge.com
Status: PARTY

ANGELA TORR
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE ST, RM. 1058, B10A
SAN FRANCISCO CA 94105
Email: act6@pge.com
Status: INFORMATION

ANN L. TROWBRIDGE ATTORNEY
DAY CARTER & MURPHY, LLP
3620 AMERICAN RIVER DRIVE, STE 205
SACRAMENTO CA 95864
FOR: Modesto/Merced Irrigation
Email: atrowbridge@daycartermurphy.com
Status: PARTY

Christopher R Villarreal
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: crv@cpuc.ca.gov
Status: STATE-SERVICE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007

Commissioner Assigned: Rachelle B. Chong on March 16, 2006

ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005 CPUC REV 12-07-07

Total number of addressees: 104

JOY A. WARREN REGULATORY ADMINISTRATOR
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
FOR: Modesto Irrigation District
Email: joyw@mid.org
Status: PARTY

GREGGORY L. WHEATLAND ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814
FOR: Vote Solar Initiative
Email: glw@eslawfirm.com
Status: PARTY

SHIRLEY A. WOO ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B30A
SAN FRANCISCO CA 94105
Email: SAW0@pge.com
Status: PARTY

RON WETHERALL ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH ST MS 20
SACRAMENTO CA 96814-5512
FOR: CALIFORNIA ENERGY COMMISSION
Email: rwethera@energy.state.ca.us
Status: STATE-SERVICE

JOSEPH F. WIEDMAN ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Solar Alliance
Email: jwiedman@goodinmacbride.com
Status: PARTY

RUSSELL G. WORDEN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: russell.worden@sce.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

EMAIL SERVICE LIST

Downloaded December 11, 2007, last updated on December 7, 2007
Commissioner Assigned: Rachelle B. Chong on March 16, 2006;
ALJ Assigned: David K. Fukutome on March 16, 2006

CPUC DOCKET NO. A0603005

Application of Pacific Gas and Electric Company To Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design. (U 39 M)	Application 06-03-005 (Filed March 2, 2006)
---	--

act6@pge.com;agc@cpuc.ca.gov;ahk4@pge.com;ahmad.faruqui@brattle.com;am4@cpuc.ca.gov;atrowbridge@daycartermurphy.com;bill@econsci.com;bill@jbsenergy.com;bkb@cpuc.ca.gov;blaising@braunlegal.com;brbarkovich@earthlink.net;bruce.foster@sce.com;bsk@cpuc.ca.gov;bsl@cpuc.ca.gov;Case.Admin@sce.com;casner@packetdesign.com;cbaaqee@ebmud.com;cem@newsdata.com;CentralFiles@semprautilities.com;cmanson@semprautilities.com;cmkehrin@ems-ca.com;crv@cpuc.ca.gov;ctd@cpuc.ca.gov;dbyers@landuselaw.com;dcarroll@downeybrand.com;dfc2@pge.com;dgeis@dolphingroup.org;dkf@cpuc.ca.gov;dlf@cpuc.ca.gov;douglass@energyattorney.com;DSS8@pge.com;ek@a-klaw.com;epoole@adplaw.com;filings@a-klaw.com;francis.mcnulty@sce.com;francis.mcnulty@sce.com;fvr@cpuc.ca.gov;gayatri@jbsenergy.com;glw@eslawfirm.com;gtropsa@ice-energy.com;gxh@cpuc.ca.gov;hayley@turn.org;info@calseia.org;jeanne.sole@sfgov.org;jef@cpuc.ca.gov;Jennifer.Shigekawa@sce.com;jimross@r-c-s-inc.com;joyw@mid.org;jpross@sungevity.com;jsqueri@gmssr.com;jwiedman@goodinmacbride.com;karen@klindh.com;KCordova@semprautilities.com;keith.mccrea@sablaw.com;kfoley@sempra.com;khojasteh.davoodi@navy.mil;kjsimonsen@ems-ca.com;klatt@energyattorney.com;laura.rooke@pgn.com;liddell@energyattorney.com;lmh@eslawfirm.com;lnelson@westernrenewables.com;ltn3@pge.com;marcel@turn.org;maricruz.prado@sce.com;mark.s.martinez@sce.com;mbrubaker@consultbai.com;mday@goodinmacbride.com;mflorio@turn.org;mrw@mrwassoc.com;nes@a-klaw.com;nil@cpuc.ca.gov;norman.furuta@navy.mil;pfa@cpuc.ca.gov;phanschen@mofo.com;pk@utilitycostmanagement.com;pthompson@summitblue.com;ralph.dennis@constellation.com;rat9@pge.com;rkeen@manatt.com;rliebert@cbbf.com;rmccann@umich.edu;rob@clfp.com;rogerl47@aol.com;rosshemphill@fscgroup.com;rrh3@pge.com;rschmidt@bartlewells.com;russell.worden@sce.com;rwethera@energy.state.ca.us;SAW0@pge.com;scr@cpuc.ca.gov;sdbraithwait@caenergy.com;sls@a-klaw.com;smindel@knowledgeinenergy.com;stacie.schaffer@sce.com;stephen.morrison@sfgov.org;stephengeorge@fscgroup.com;tburke@sfgwater.org;tmacbride@goodinmacbride.com;tomb@crossborderenergy.com;tomk@mid.org;wbooth@booth-law.com;wendy@econinsights.com;wtr@cpuc.ca.gov;